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Attorney for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ADOBE SYSTEMS INCORPORATED, a
Delaware Corporation,

Case No.: 3:14-cv-04871-EMC

Plaintiff.

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METROTECH SOLUTIONS USA INC., a Delaware Corporation; 9199-6546 QUEBEC INC., a Canadian Quebecois Corporation doing business as METROTECH SOLUTIONS INC., METROTECH SOLUTIONS and METROTECH; and DOES 2-10, Inclusive.

**SECOND STIPULATION TO
CONTINUE HEARING AND BRIEFING
SCHEDULE ON PLAINTIFF'S MOTION
FOR CONTEMPT AND [PROPOSED]
ORDER**

Defendants

Plaintiff ADOBE SYSTEMS INCORPORATED (“Plaintiff”), by and through its counsel of record, and Defendants METROTECH SOLUTIONS USA INC.; 9199-6546 QUEBEC INC., d/b/a METROTECH SOLUTIONS INC., METROTECH SOLUTIONS and METROTECH; 9188-0047 QUEBEC INC. d/b/a UKTECH STORE; and 9199-6587 QUEBEC INC. d/b/a IT

1 FACTORY (collectively “Defendants”), by and through their counsel of record, hereby stipulate
2 and agree as follows:

3 **RECITALS**

4 On August 20, 2015, the Court entered a PERMANENT INJUNCTION AGAINST DEFENDANTS
5 AND DISMISSAL WITH PREJUDICE (D.E. 31) (“Injunction”).

6 On June 1, 2017, Plaintiff filed its MOTION FOR CONTEMPT AND SANCTIONS AGAINST THE
7 ENJOINED PARTIES (D.E. 33) (“Motion”), asserting that Defendants violated the Injunction by
8 dealing in Adobe products, specifically through their illegal distribution of unbundled (and in
9 one instance, previously activated) Adobe software products.

10 On June 14, 2017, the Parties filed a STIPULATION TO CONTINUE HEARING AND BRIEFING
11 SCHEDULE ON PLAINTIFF’S MOTION FOR CONTEMPT (D.E. 35) (“First Stipulation”) in order to
12 allow the Parties time to resolve the issues addressed in the Motion.

13 On June 15, 2017, the Court granted the Parties’ First Stipulation and continued the
14 hearing on the Motion to August 3, 2017, with response dates adjusted accordingly.

15 Thereafter, Defendants produced certain documents to Plaintiff in an effort to resolve
16 Plaintiff’s claims, and the Parties have been working towards resolution of the issues contained
17 in the Motion. The Parties, however, need additional time to pursue such a resolution.

18 **AGREEMENT**

19 Accordingly, Plaintiff and Defendants hereby stipulate and respectfully request the Court
20 continue the hearing on the Motion to August 24, 2017, or a date thereafter acceptable to the
21 Court.

22 Additionally, Plaintiff and Defendants hereby stipulate and respectfully request that
23 Defendants’ response to the Motion be due on or before August 3, 2017.

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1 Plaintiff and Defendants hereby stipulate and respectfully request that Plaintiff's reply
2 shall be due on or before August 10, 2017.
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4 DATED: July 7, 2017

JOHNSON & PHAM, LLP

5 By: /s/ Nicole Drey Huerter

6 Nicole Drey Huerter, Esq.

7 Attorneys for Plaintiff

ADOBE SYSTEMS INCORPORATED

8 DATED: July 7, 2017

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LAW OFFICES OF GEORGE A. SHOHET,
A PROF. CORP.

By: /s/ George A. Shohet

Pierre Francis

Attorney for Defendants

METROTECH SOLUTIONS USA INC.; 9199-
6546 QUEBEC INC., d/b/a METROTECH
SOLUTIONS INC., METROTECH SOLUTIONS
and METROTECH; 9188-0047 QUEBEC INC.
d/b/a UKTECH STORE; and 9199-6587 QUEBEC
INC. d/b/a IT FACTORY

[PROPOSED] ORDER

Pursuant to Stipulation, the hearing on Plaintiff's MOTION FOR CONTEMPT AND
SANCTIONS AGAINST THE ENJOINED PARTIES ("Motion") is reset from August 3, 2017, to
August 24, 2017. Defendants' response to the Motion is due three (3) weeks prior
to the hearing date. Plaintiff's reply to the Motion is due two (2) weeks prior to the hearing date.

IT IS SO ORDERED.

DATED: July 11, 2017

